

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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THOMAS M. JACKSON and PATRICIA G.  
JACKSON, as individuals and as  
representatives of the classes,

Plaintiffs,

v.

WELLS FARGO BANK, N.A. and  
WELLS FARGO INSURANCE, INC.

Defendants.

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**Civil Action No.: 2:12-cv-01262-DSC**

**Judge David Stewart Cercone**

**ELECTRONICALLY FILED**

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**DECLARATION OF JOEL BOTZET SUBMITTED IN CONNECTION WITH WELLS  
FARGO'S RESPONSE TO THE OBJECTION OF WEI CYRUS HUNG**

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I, Joel Botzet, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the a Senior Project Administrator of Rust Consulting, Inc. ("Rust"), a firm in Minneapolis, Minnesota that provides consulting services to the design and administration of class action and mass tort litigation settlements and notice programs. Rust has served as the settlement administrator in this case..

2. I am over the age of 18, and I am authorized to speak on behalf of Rust.

3. If called as a witness, I could and would competently testify to the following, which is within my personal knowledge and/or was based on information provided by Rust personnel.

**REVIEW OF DATA FOR CLAIMS SUBMITTED**

4. As of January 20, 2015, Rust had received approximately 244,610 claims from class members.

5. The data Wells Fargo provided with the Class mailing list in November 2014, included fields titled "amount paid by borrower," "amount paid by lender," "amount paid by seller," and "amount paid by third party." Using electronic queries, Rust reviewed these data fields for the approximately 244,610 claims submitted through January 20, 2015. That data showed the following.

6. The data that Wells Fargo provided reflects no information at all in any of the flood-hazard-determination-fee fields for 60,911 records.

7. 183,699 of the records had information in one or more of the flood-hazard-determination-fee field. However, of these 183,699 records, 64,946 reflected that the borrower had paid "\$0.00" for a flood hazard determination.

8. Of these 64,946 records, 56,637 reflect that the lender paid some amount for a flood hazard determination fee. However, the amounts that the lender paid (or others paid) are not a uniform \$19. While it is my understanding that the cost of a flood hazard determination fee was generally \$19, however, Wells Fargo's data reflects not just \$19, varying amounts paid for a flood hazard determination fee, from \$0.01 to \$3,625.55.

**COST OF MAILING CHECKS TO 2.3 MILLION BORROWERS**

9. One of the costs of administering the settlement is the cost of printing checks and mailing them to class members.

10. For approximately 295,000 class members who submitted claims, the cost of printing checks and mailing them to these class members will be approximately \$235,000.

11. It would be substantially more expensive to print and mail checks to all 2.3 million borrowers that Wells Fargo has identified as potential class members. I estimate that it would cost approximately \$1.6 million to print and mail checks to 2.3 million borrowers. This number does not include costs of processing returned undeliverable mail, re-mailing checks when new addresses can be located, processing and handling uncashed checks and lost or fraudulently cashed checks.

I declare under penalty of perjury under the laws of the State of Minnesota that the foregoing is true and correct.

February 19, 2015

By:   
Joel Botzet